

Hon. Salvador Mendoza, Jr.

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*Attorneys for Plaintiff Rechael Driver*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON**

RECHAEL DRIVER, an individual,  
  
Plaintiff,  
  
v.

Case No.: 2:17-cv-00303-SMJ

**PLAINTIFF RECHAEL DRIVER'S  
WITNESS LIST**

COURTYARD SPOKANE  
DOWNTOWN AT THE CONVENTION  
CENTER; an unknown business entity;  
COURTYARD MANAGEMENT  
CORPORATION, a Delaware  
corporation; MARCOURT  
INVESTMENTS INCORPORATED, a  
Maryland corporation; and DOES 1  
through 50,  
  
Defendants.

Pursuant to this Court's Scheduling Order, plaintiff submits her witness

PLAINTIFF WITNESS LIST - 1  
{S1857030; 1 }

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Attorneys & Counselors

list. Plaintiff reserves the right to examine (on direct or cross) any witnesses listed on defendants' witness list, and reserves the right to call rebuttal witnesses.

<b>Name</b>	<b>Description</b>	<b>Anticipated Testimony</b>	<b>Expert?</b>	<b>Scheduling Conflicts</b>
Rechael Driver	Plaintiff	Her involvement in the voyeurism incident and resultant damages	No	None
Rebecca Driver	Mother of Plaintiff	Knowledge of voyeurism incident and her daughter's damages	No	None
Luke Moffitt	Significant other of Plaintiff	Knowledge of impact of voyeurism incident and resultant damages	No	None
Michael Driver	Father of Plaintiff	Knowledge of voyeurism incident and his daughter's damages	No	None
Pam Alfaro	General Manager of Courtyard Spokane; Designated PMK Witness	Knowledge of hotel policies and procedures; inspected subject door gap after the incident	No	Unknown
Christopher Mount	Assistant GM of Courtyard Spokane	Knowledge of hotel policies and procedures; inspected subject door gap after the incident	No	Unknown
Bob Bower	Chief Engineer for Courtyard Spokane	Knowledge of hotel maintenance and repair of subject door gap	No	Unknown

PLAINTIFF WITNESS LIST - 2  
{S1857030; 1 }



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<b>Name</b>	<b>Description</b>	<b>Anticipated Testimony</b>	<b>Expert?</b>	<b>Scheduling Conflicts</b>
Ronnie Parsley	Courtyard Spokane Night Security Guard	Responded to plaintiff's room after voyeurism incident	No	Unknown
Officer Beau Brannon	Spokane Police Officer	Responded to plaintiff's call to police re voyeurism incident; will describe interactions with plaintiff and arrest of Pedigo	No	Unknown
Officer Shane Oien	Spokane Police Officer	Documented (photographed) search warrant execution and seizure of evidence	No	Unknown
Lois Franz	Courtyard Spokane Front Desk Employee	On duty night of incident; spoke with plaintiff's father	No	Unknown
Bob Simonson	Regional Vice President of engineering and facilities for the western region of the Americas, for Marriott International.	Rule 30(b)(6) witness regarding design standards	No	Unknown
Michelle Jensen	Plaintiff's Current Therapist	Plaintiff's mental health symptoms caused by the voyeurism incident	Percipient and Expert	None
Bonnie Rumble	Plaintiff's Former Therapist	Treated Plaintiff immediately after voyeurism incident; will speak on psychological damage	Percipient and Expert	None

PLAINTIFF WITNESS LIST - 3  
{S1857030; 1 }



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<b>Name</b>	<b>Description</b>	<b>Anticipated Testimony</b>	<b>Expert?</b>	<b>Scheduling Conflicts</b>
Fred Del Marva	Hotel Practices Expert	Opinions regarding defendants' negligence, improper procedures, and other opinions contained within his written reports	Yes	None
Jack Diehl	Architect	Opinions regarding improper installation of door shoe under subject connector doors	Yes	None
Dominick Addario, M.D.	Psychiatrist	Opinions regarding how the voyeurism incident affect plaintiff's mental health and need for future treatment; affect of employment	Yes	Dr. Addario is scheduled to present at a conference at Johns Hopkins University and may have a potential conflict depending on actual date of testimony
Cloie Johnson	Vocational Rehabilitation	Opinions about how the voyeurism has impacted plaintiff's employability and future prospects for employment and earnings	Yes	None

**PLAINTIFF WITNESS LIST - 4**  
{S1857030; 1 }



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Name	Description	Anticipated Testimony	Expert?	Scheduling Conflicts
Sean Black	Economist	Quantify plaintiff's economic loss	Yes	None

Dated: May 23, 2019

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By: /s/ Daniel J. Gibbons

Daniel J. Gibbons, Esq.

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*Attorneys for Plaintiff, Rachael Driver*

Dated: May 23, 2019

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*Attorneys for Plaintiff, Rechael Driver*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of May, 2019,

1. I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Daniel E. Thenell: [dan@thenelllawgroup.com](mailto:dan@thenelllawgroup.com)  
Christina Anh Ho: [christina@thenelllawgroup.com](mailto:christina@thenelllawgroup.com)  
Victor Corpuz: [CorpusV@jacksonlewis.com](mailto:CorpusV@jacksonlewis.com)  
Jason Pedigo: [JasonPedigo@yahoo.com](mailto:JasonPedigo@yahoo.com)

2. I hereby certify that I have mailed by United States Postal Service the foregoing document to the following non-CM/ECF participants at the address listed: **None.**
3. I hereby certify that I have mailed by United States Postal Service the document to the following CM/ECF participants at the address listed below: **None.**
4. I hereby certify that I have hand-delivered the document to the following participants at the addresses listed below: **None.**

WITHERSPOON KELLEY

By: /s/ Daniel J. Gibbons  
Daniel J. Gibbons, WSBA #33036  
*Attorneys for Plaintiff*